

1 JOINTLY SUBMITTED

2
3 **UNITED STATES DISTRICT COURT**
4 **DISTRICT OF NEVADA**

5
6 BLAKE COOLEY, individually and on behalf of
all others similarly situated,

7 Plaintiff,

8 vs.

9 HIBU INC., a Delaware corporation,

10 Defendant.

Case No. 2:19-cv-00269-MMD-VCF

STIPULATION OF DISMISSAL

1 It is hereby stipulated and agreed, by and among the parties hereto, that pursuant to Federal
2 Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Blake Cooley (“Plaintiff”) voluntarily dismisses,
3 with prejudice, the complaint and all claims alleged therein against Defendant Hibu Inc.
4 (“Defendant”), and voluntarily dismisses the putative class claims alleged against Defendant in the
5 complaint without prejudice. Each party shall each bear its own fees and costs. The Parties agree
6 that the Court shall retain jurisdiction to enforce the terms of the Stipulated Protective Order. (Dkt.
7 No. 52.)

8
9 DATED: August 6, 2019

LAW OFFICES OF CRAIG B. FRIEDBERG
TERRELL MARSHALL LAW GROUP LLP
PARONICH LAW, P.C.
HEIDARPOUR LAW FIRM, PLLC

12 By: /s/ Anthony Paronich

Craig Friedberg
Adrienne McEntee
Jennifer Murray
Anthony Paronich
Andrew Heidarpour

15 Attorneys for Plaintiff
16 BLAKE COOLEY

17 DATED: August 6, 2019

HEJMANOWSKI & MCCREA LLC
BLANK ROME LLP
COPILEVITZ, LAM & RANEY, P.C.

19 By: /s/ Harrison Brown

Charles H. McCrea
Ana Tagvoryan
Harrison Brown
William E. Raney
Kellie Mitchell Bubeck

22 Attorneys for Defendant
23 HIBU INC.

1 **[PROPOSED] ORDER**

2 Pursuant to the Stipulation of Plaintiff Blake Cooley (“Plaintiff”) and Defendant Hibu Inc.
3 (“Defendant”) (together, the “Parties”), and for good cause showing, IT IS HEREBY ORDERED
4 that the complaint and all claims alleged therein against Defendant are dismissed with prejudice, and
5 the putative class claims alleged against Defendant in the complaint are dismissed without prejudice.
6 Each party shall each bear its own fees and costs. The Court shall retain jurisdiction to enforce the
7 terms of the Stipulated Protective Order (Dkt. No. 52).

8
9 DATED: August 8, 2019

10 By: 

11 Hon. Miranda M. Du
12 United States District Judge
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

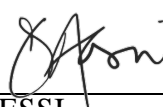
I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2029 Century Park East, 6th Floor, Los Angeles, California 90067.

On August 6, 2019, I caused to be served the foregoing document(s) **STIPULATION OF DISMISSAL** on the interested parties in this action addressed and sent as follows:

(SEE ATTACHED SERVICE LIST)

- ☐ **BY ENVELOPE:** by placing ☐ the original ☐ a true copy thereof enclosed in sealed envelope(s) addressed as indicated and delivering such envelope(s):
- ☐ **BY PERSONAL SERVICE:** I caused the envelope(s) to be delivered by hand to the offices of the addressee(s).
- ☐ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office or home of the addressee(s) as indicated. I am "readily familiar" with this firm's practice of collection and processing documents for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☐ **BY FEDEX:** I caused such envelope(s) to be deposited in a box or other facility regularly maintained by FedEx, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents in an envelope designated by the said express service carrier, addressed as indicated, with delivery fees paid or provided for, to be transmitted by FedEx.
- ☐ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) listed above to be transmitted to the person(s) at the e-mail address(es) as indicated. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was incomplete or unsuccessful.
- ☒ **BY CM/ECF:** I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. I certify that service will be accomplished by the CM/ECF system and the foregoing document(s) will be delivered to all participants in the Service List who are registered CM/ECF users.
- ☒ **FEDERAL:** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on August 6, 2019, at Los Angeles, California.



DIA S. ALESSI

SERVICE LIST

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